



IN REPLY REFER TO:
N1619(NCR-MANA)

United States Department of the Interior

NATIONAL PARK SERVICE

Manassas National Battlefield Park

12521 Lee Highway

Manassas, Virginia 20109-2005

January 25, 2011

Ms. Jean W. Gregory
Department of Environmental Quality
P.O. Box 10009
Richmond, Virginia 23240-0009

Dear Ms. Gregory:

Manassas National Battlefield Park (MNBP) is interested in issuing a formal petition, requesting categorization of the MNBP bordered segment of Bull Run as an Exceptional State Water. Bull Run is a vital historic, recreational, ecological, and cultural waterway that has served as an important landmark and resource to our nation's history; a vital habitat and nutrient replenishing source to important riparian community types and the Chesapeake Bay; and a key component for recreation and research to the citizens of Northern Virginia and remaining public.

MNBP is particularly interested in this designation as the river forms the eastern boundary of the park, and is one of, if not the most important feature to the parks heritage. The name of the river itself has national significance as many connect the name of Bull Run with the first battle of the Civil War; the northern name for the first battle is the Battle of Bull Run, still commonly taught in schools across the north.

Ecologically the bottomland forests bordering Bull Run have outstanding beauty. The elevated floodplain levees and terraces bordering Bull Run, the lush herb layer, presence of sensitive species of concern in the state of Virginia- such as beard's tongue (*Penstemon canescens*) and the Red-headed Woodpecker (*Melanerpes erythrocephalus*), as well as the prevalence trees adapted to alluvial soil conditions, making this important community type (Piedmont/Mountain bottomland Forest) a distinctive element interconnected with the Bull Run system. Thousands of bluebells in the spring also makes this stretch of park an unforgettable sight that attracts many visitors.

The area can only be accessed via foot trails keeping the area undisturbed. Many visit the area for photography, fishing, year round hiking, general nature viewing, birding and springtime canoeing and kayaking. In addition, of course, people visit the historic stone bridge that crosses this river and hike the trails to learn of the First Battle of Manassas.

The qualities stated above help to outline the true importance of the MNBP stretch of Bull Run. The river segment that borders and transects MNBP is being proposed for consideration as an 'exceptional quality of water' under several guiding principles found within the 1997 Exceptional Water's Guidance protocol; specifically under the subtitles of the 'Exceptional Environmental Settings (EES)' and 'Exceptional Recreational Opportunities (ERO)' portions of the policy document. Under the EES portion of the 1997 document, three major identifying features are prevalent within and amongst the corridors in this stretch of Bull Run. The list ensues:

'The water possesses outstanding scenic beauty resulting from natural features' - the significant community type of the Piedmont rare Eastern White Pine among the bluffs overlooking the river; the seasonally flooded bottomland hardwood forests along the meandering Bull run, confirmed home and habitat to Audubon declared species of high concern in Virginia, the Red-headed Woodpecker (*Melanerpes erythrocephalus*).

'The water represents an important component of a state or national park'- the First Battle of Manassas and the first major land battle of the Civil War is often referred to as the Battle of Bull Run, underlining the importance and significance of this river to the establishment of this park. The river was an important component in the strategies employed by the two sides.

'The water includes remote...or, relatively 'undeveloped' areas with motor vehicle access restricted or unavailable'- a satellite image of the Bull Run terrain in relation to MNBPN quickly highlights the level of 'un-development' by the park. Except for the Stone Bridge parking facility, the remainder of the park land and Bull Run corridor remain in a natural setting with foot traffic only.

Under the ERO section, activities that may deem a waterway as exceptional quality need characteristics such as: *'...fishing, canoeing...birding, hiking...or the like'*- all of which are prevalent and abundant in the areas of MNBPN next to, around, and in the historic meander of Bull Run.

Under the guidelines for Exceptional Water qualification Bull Run must possess *"surface waters, or portions of the water body...that provide exceptional environmental settings and either exceptional aquatic communities or exceptional recreational opportunities."* The segment of Bull Run that borders and transects MNBPN easily meets these standards and should qualify under normal conditions as Exceptional Waters.

This petition will help to further established management and public consideration of the values related to MNBPN. The decisions and abilities of MNBPN to continue an emphasis on the health, diversity, and ecological dynamics of one of the most important natural and cultural features within the park would be best represented through this prestigious nomination, aiding in the ability of the river, the adjacent riparian natural system, and the Chesapeake Bay into which it drains, to continue productive functionality, while being immersed within a continuously urbanizing landscape. Designation would as well be an extremely valuable education tool for the public to understand the vitality and necessity of establishing zones of higher recognition. Designation may also prompt further study and analysis of organisms present which may also lead to an adjusted management tactics to better cope with biodiversity needs, and management of the adjacent riparian areas of Bull Run and its tributaries within the MNBPN.

If there is any other information I can provide, please do not hesitate to contact me at (703) 754-1861.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward W. Clark, III', with a long, sweeping horizontal line extending to the right.

Edward W. Clark, III
Superintendent